

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
ILLINOIS

ME2 Productions, Inc.,

Plaintiff,

v.

Case No. 1:17-cv-03851

John Does 1-27

Defendants.

Hon. Gary Feinerman

MOTION FOR PROTECTIVE ORDER AND MOTION FOR EXTENSION OF TIME

COMES NOW Defendant John Doe 23, by and through counsel, and pursuant to Federal Rule of Civil Procedure 6(b) respectfully move this Court for an extension of time and motion for protective order, showing the Court as follows:

1. Plaintiff filed its Complaint on May 23, 2017. [ECF No. 1]
2. Plaintiff's Motion for Leave to Take Discovery Before the Rule 26 Conference was filed on June 12, 2017. [ECF No. 8-10]
3. On June 14, 2017, the Court granted Plaintiff's Motion. [ECF No. 11]
4. Defendant's deadline to object to the subpoena is close of business on Friday, August 4, 2017.
5. Counsel for Defendant is engaging in good faith settlement negotiations with counsel for Plaintiff. Additional time is required to permit the parties to complete their negotiations and determine whether an amicable resolution of Plaintiff's claims against Defendant John Doe 23 can be reached.

6. Defendant is seeking an extension of time for a period of 14 days to confer with counsel and to determine how to proceed in this matter, pending resolution of her negotiations with plaintiff.
7. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
8. This is the first request for an extension made by Defendant in this matter.
9. This extension will not unduly burden Plaintiff.

WHEREFORE, Defendant respectfully requests that this Court grant her Motion for Extension of Time, extending the deadline to object to the subpoena for a period of 14 days, or through August 18, 2017.

Respectfully submitted,

/s/ Erin K. Russell

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CERTIFICATE OF SERVICE

This is to certify that on August 4, 2017, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell